## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

841 Chestnut Building Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection

John Hues Pland - St. Albans in DATE: 12) 17/87

FROM:

Manglas A. Donor, Environmental Scientis

DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

TO:

FILE

THRU:

John A. Armstead, Chief (B.J. 12/3)/61

DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

BASED UPON REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS REQUIRED AT THIS TIME.



### STATE OF WEST VIRGINIA **DEPARTMENT OF NATURAL RESOURCES**

ARCH A. MOORE, JR. Governor

**DIVISION OF WASTE MANAGEMENT** 1260 Greenbrier Street Charleston, West Virginia 25311 September 29, 1987

**RONALD R. POTESTA** Director **ROBERT K. PARSONS** Deputy Director

Tom Worstell Appalachian Power Company John Amos Plant P.O. Box 2021 Roanoke, Virginia 24022

OCT 21 1987 BERY COMMENSAGE ELECTION RECEIVED

Dear Mr. Tom Worstell:

Enclosed is a copy of the "Compliance Evaluation Inspection" (CEI) Report completed on your facility by representatives of the Chief of the Division of Waste Management. This report is based on the inspection conducted September 22, 1987; also enclosed is a copy of the EPA Notification of Hazardous Waste Activity booklet.

non-compliance of the There were no areas of appropriate Hazardous Waste Management Regulations documented during the inspection.

Thank you for your assistance and cooperation during the inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at (304) 348-5929.

Sincerely,

DIVISION OF WASTE MANAGEMENT

Ava C. Zeitz, Section Leader

Compliance Monitoring & Enforcement

ACZ:sh

Enclosure

CC: Divity Division, 1844, Region-1111.

Rebecca J. Robertson, Inspector

### INSPECTION FACT SHEET

COMPANY NAME: Appalachian Power Company

John Amos Plant

I. D. #:

WVD980554646

SQG

MAILING ADDRESS:

P.O. Box 2021

Roanoke, VA 24022

TYPE OF FACILITY:

LOCATION:

Rt. 35, Morgan's Landing

near St. Albans, WV

COUNTY:

Putnam

COMPANY CONTACT:

Tom Worstell, Danny Gray

HANDLING CODES:

PHONE:

(304) 755-5301

PURPOSE:

To conduct a RCRA Compliance Evaluation Inspection of a Conditionally

Exempt Small Quantity Generator.

APPLICABLE REGULATIONS:

West Virginia Hazardous Waste Management Regulations;

Chapter 20, Article 5E; and 40 CFR, Part 260-266.

### LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled; where it goes) Doo1; < 220 lbs./month - burned with waste oil and coal for energy recovery in a electric generating facility.

DATE INSPECTED:

September 22, 1987

INSPECTORS:

(1) Rebecca J. Robertson, Supervisor

(2)

(3)

DATE PREPARED:

September 23, 1987

PREPARED BY:

Rebecca J. Robertson

### TABLE OF CONTENTS

Location Map
Inspection Report
Compliance Evaluation
Inspector Concerns
Site Map

DATE PREPARED:

September 23, 1987

PREPARED BY:

Rebecca J. Robertson, Supervisor

SUBJECT:

Compliance Evaluation Inspection of,

John Amor Power Plant,

Morgans Landing, Putnam County

DATE OF INSPECTION:

September 22, 1987

On September 22, 1987, the above conducted a Compliance Evaluation Inspection of John Amos Power Plant, Appalachian Power Company. The facility has advised the Division that they plan to maintain the identification number although they do not generate hazardous waste. I advised the facility they are generating hazardous waste, an ignitable solvent. The MSDS indicates the Stoddard Solvent has a flash point of 55°F, and the Varsol has a flash of 100°F. Both are hazardous according to the MSDS however, analytical work has been done on samples which indicates that the flash of the Varsol waste is greater than 140°F. Solvents are used in the lab for cleaning glassware and in the machine shops for parts cleaning. When waste is generated, it is placed in the coal hopper which is being used and the material is burned for energy recovery. The Stoddard solvent is being placed on the coal pile (inside the hopper).

Records indicate the company is generating less than 220 lbs. per month making them a Small Quantity Generator who is conditionally exempted. Better records should be kept, however, since the facility has no hard records and they are only maintaining use data.

When a lab container of solvent is generated, it is taken and poured into the waste oil tank. Waste oil is analyzed only for PCB content. At less than 1 ppm PCB's, it is burned with the coal; 1-49 ppm is sent to the Glen Lynn Plant in Virginia; and greater than or 50 ppm is sent to Rollins Incinerators at Deerpark, Texas.

Danny Gray, Senior Environmental Engineer, contacted me on September 23, 1987 regarding what the facility was doing in regards to Hazardous Waste Management. From information collected it appears the facility is in compliance with the Small Quantity Generator Regulations.

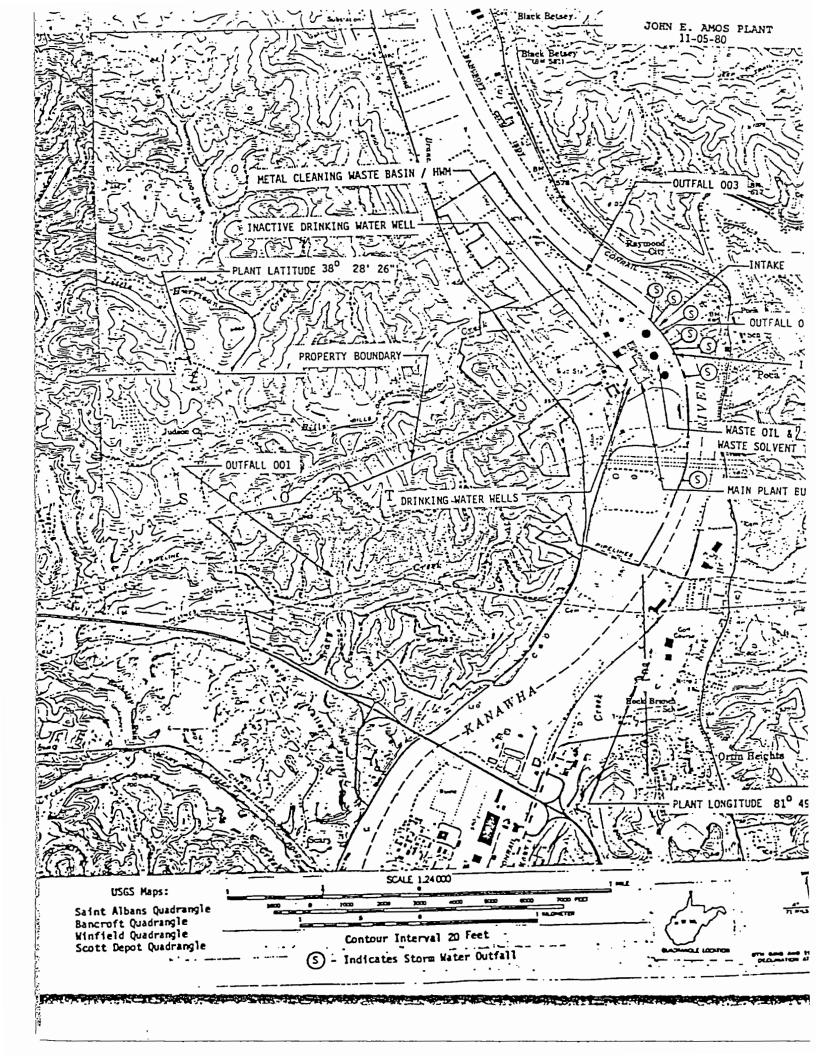
### Compliance Evaluation:

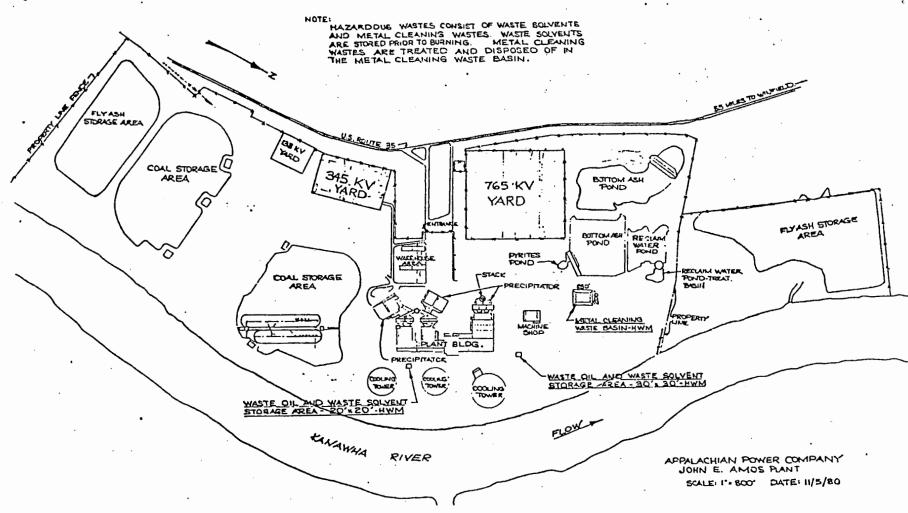
No violations were noted during the inspection.

### Inspector Concerns:

The following concerns was noted during the inspection:

- 1. Records of disposal should be kept to maintain quantity descriptions.
- 2. Facility needs to submit a subsequent notification since they withdrew Part A and previous notification is incorrect.





THE PERSONNEL PROPERTY OF THE PERSON OF THE PERSON WAS ARRESTED AND THE PERSON WAS ARRESTED AND THE PERSON OF THE

April 29, 1985

CERTIFIED LETTER

Mr. Stephen R. Wassersug, Director Hazardous Waste Management Division U.S. Environmental Protection Agency Region III 841 Chestnut Building Philadelphia, Pennsylvania 19107

> Re: WVD 980554646 John E. Amos Plant

Dear Mr. Wassersug:

In response to your letter concerning the Appalachian Power Company facility listed above, we are submitting the following response.

Appalachian Power Company submitted a Part A hazardous waste permit application for the above-listed facility on December 17, 1980 as a precautionary measure to preserve the privileges offered as an interim status facility. On May 19, 1982, Appalachian Power Company filed an amendment to the application which removed the storage and disposal listing for the surface impoundment.

On February 23, 1984, Appalachian Power Company filed a letter requesting that the Part A application for this facility be withdrawn since no hazardous wastes were treated at this facility during the interim status period. Since no hazardous wastes were treated, stored, or disposed of at this facility, a Part B application is not required and closure of the facility units is not required.

Pursuant to my conversation with Mr. Harry Harbold, I am attaching copies of analyses of a boiler cleaning waste stream.

If you should have additional questions, please contact me at (703) 985-2376.

Sincerely,

Danny L. Gray, P.E. Environmental Engineer Senior

DLG:d Attachments cc: Mr. Harry Harbold, 3HW31
U.S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

NOTES: Analysis by EP TOXICITY Test PROCEDURE Federal Register / Vol 45, No 98 p 33/27 \* Courent Instrument Sensituity

ر کری	10. Total	101111 MED-20-3 (3/81) - KCBE-KIR
<b>CI</b> 533	5.5.6.000	AMERICAN ELECTRIC POWER SERVICE CORPORATION
		GENERAL LABORATORY
MI	Robedo.	
1/ /	Bailes	Mail Address Parcel Post and Express Address
λ, ζ	0 0	P. O. Box 565 1122 Seventh Avenue
R G	workness	Huntington, WV 25710 Huntington, WY 25701
	0 - 1.101	08 0 11 1 6 11 1
Compan	y & Facility Central	OF Co, Philip Sporn Ylant
•	-	
NP DES	Permit No. (If applicable)	
.Outfal	1 No. (if applicable)	·
		0 1
Sample	Collection: (Date)	(Time) (Source) Composite
	C 41 m	
	from #5	
		(Analysis No.) 46548
Sample	Received: (Date)	(Analysis No.) 40010
	200115752	
STORET #	PARAMETER mg/L	
01022	Boron, B	STORET # PARAMETER ug/L
71870 .	Bromide, Br	O1105 Aluminum, Al
00940	Chloride, Cl	01097 Antimony, Sb
00340	COD	01002 Arsenic, As 25.
00720	Cyanide, CN	01007 Barium, Ba 1,740,
00951	Fluoride, F	01012 Beryllium, Be
00610	Nitrogen, Ammonia, NH3	01027 Cadmium, Cd 80.
00630	Nitrogen, Nitrate-Nitrite	01032 Chromium, +6Cr 000
00620	Nitrogen, Nitrate, NO3	01034 Chromium, Cr 570.
00615	Nitrogen, Nitrite, NO2	01037 Cobalt, Co
00605	Nitrogen, Total Organic	01042 Copper, Cu
00665	Phosphorus, P	01045 Iron, Fe
00955	Silica, SiO2	01051 Lead, Pb 100.
00945	Sulfate, SO4	01055 Manganese, Mn
00745	Sulfide, S	71900 Mercury, Hg <. 2
38260	Surfactants, MBAS	01062 Molybdenum, Mo
00625	TKN, N	01067 Nickel, Ni
00680	TOC, C	01147 Selenium, Se . 20.
	μ <u>9/L</u>	01077 Silver, Ag 350
39516	PCBs	01059 Thailium, Ti
32730	Phenolics .	01102 Tin, Sn
	Misc. unit	s 01152 Titanium, Ti
00403	pH, Lab @ 25°C	01087 Vanadium, V
		01092 Zinc, Zn
	mg/L	mg/L
70508	Acidity, CaCO3	00916 Calcium, Ca
00410	Alkalinity, CaCO3	74010 Iron, Fe
50064	Chlorine, FAC	00927 Magnesium, Mg
5 <b>0</b> 06 <b>0</b>	Chlorine, TRC	00937 Potassium, K
00900	Hardness, Total CaCO3	00929 Sodium, Na
00556	Oil & Grease	_
<b>7</b> 0 <b>300</b>	Residue, Filterable	00310 BOD5, mg/L
00530	Residue, Nonfilterable	31616 Fecal Coliform, #/100ml
00500	Residue, Total	34466 Phenol, µg/L
00505	Residue, Volatile	-
00740	Sulfite, SO3	_
	Hisc. unit	<u> </u>
08000	Color, Pt-Co Units	<del>-</del>
00083	Color, Visual Severity	-
00056	Flow, GPD	-
00058	Flow, GPM	- 555
500 <b>50</b>	Flow, MGD	- Analysis by PCH OH ONB AMU
01330 00400	pH, Field	- Milarysis by Tariffy The Thirty
00403	pH, Lab @ 250C	
00095	Sp. Cond. umhos @ 25°C	
00010	Temp. °C	Report Issued By: Wetowill
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00076	Turbidity, NTU	- 1.1.0/0/
01350	Turbidity, Severity	Date Issued: ////0/8
NOTES:	Orus 11 -	
	RENOVTHUP Zint, E,	ed by pHone sample
•	V Baily J	- william sayible
	non-	hazzudous 11/18/81

D.E. KETTLEWELL M.R. ROBIDA

TW Wors Tell

AMERICAN ELECTRIC POWER SERVICE CORPORATION GENERAL LABORATORY

Meil Address P.O. Box 555 Huntington, WY 25710

Parcel Post and Express Address 1122 Seventh Avenue Huntington, WY 25701

### Company & Facility APCO, JOHN AMOS PLANT

NPDES Permit No. (If applicable)

Outfall No. (If applicable)

Sample Collection: (Date) 12-31-81 (Time) 1400 (Source)

METAL Treating Pond PUMP LINE

. FIC 144 11	CHING TOTAL CIOL
Sample Received: (Date) 3-11-82	(Analysis No.) <u>C82165</u>
STORET # PARAMETER mg/L	
01022 Boron, B	STORET # PARAMETER µg/L
71870 . Bromide, Br	01105 Aluminum, Al
00940 Chloride, Ci	01097 Antimony, Sb
00340 COD	01002 Arsenic, As 220
00720 Cyanide, CN	01007 Barium, Ba378
00951 Fluoride, F	01012 Beryllium, Be
00610 Nitrogen, Ammonia, NH3	01027 Cadmium, Cd - 20-
00630 Nitrogen, Nitrate-Nitrite	01032 Chromium, +6Cr 000
00620 Nitrogen, Nitrate, NO3	01034 Chromium, Cr 32.
00615 Nitrogen, Nitrite, NO2	01037 Cobalt, Co
00605 Nitrogen, Total Organic ·	• 01042 Copper, Cu
00665 Phosphorus, P	01045 Iron, Fe
00955 Silica, SiO2	01051 Lead, Pb 20.
00945 Sulfate, SO4	01055 Manganese, Mn
00745 Sulfide, S	71900 Mercury, Hg .3
38260 Surfactants, MBAS	01062 Holybdenum, Ho
00625 TKN, N 00680 TOC. C	01067 Nickel, Ni 01147 Seienium, Se
·	01147 Seienium, Se - <20 01077 Silver, Ag <20
<u>ид/L</u> 39516 PCBs	01079 Thallium, Ti
32730 Phenolics	01102 Tin, Sn
Misc. uni	ts 01152 Titanium, Ti
00403 pH, tab @ 25°C	01087 Vanadium, V
prij cos c s	01092 Zinc, Zn
mg/L	mg/L
70508 Acidity, CaCO3	00916 Calcium, Ca
00410 Alkalinity, CaCO3	74010 Iron, Fe
50064 Chlorine, FAC	00927 Hagnesium, Hg
50060 Chlorine, TRC	00937 Potassium, K
00900 Hardness, Total CaCO3	00929 Sodium, Na
00556 011 & Grease .	
70300 Residue, Filterable	00310 BOD5, mg/L
00530 Residue, Nonfilterable	31616 Fecal Coliform, #/100ml
00500 Residue, Total 00505 Residue, Volatile	34466 Phenol, µg/L
00740 Sulfite, S03	
Hisc. unit	<u> </u>
00080 Color, Pt-Co Units	
00083 Color, Visual Severity	
00056 Flow, GPD :=	
00058 Flow, GPM	
50050 Flow, HGD	مامر و مرسم می از این از ا
01330 Odor, Severity	Analysis by: PCH, AMW, JSS, JLB, WCK
00400 pH, Field	
00403 pH, Lab @ 250C	$-1$ $( \land \land \land \land ) \land 1$
00095 Sp. Cond. umhos @ 25°C	- 1 (V)(V)(V)
00010 Temp. OC	Report Issued By:
00011 Temp. OF	
00076 Turbidity, NTU	- 1 have been 4 - 1 - 82   1
01350 Turbidity, Severity	Date Issued:

NOTES:

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 84/chestnut 8LJ. Philadelphia, Pa. 19107

SUBJECT:

RCRA Inspection

Appalaching Power Company John AMOS Flant

DATE: July 22,1

SI ALBANS WU

WVD 98 0554646

FROM:

Douglas A. Donor, Environmental Scientist

RCRA Enforcement Section (3HW11)

TO:

File

Thru:

Peter W. Schaul, Chief

RCRA Enforcement Section (3HW11)

BASED UPON REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY

REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS

REQUIRED AT THIS TIME.



# STATE OF WEST VIRGINIA DEPARTMENT OF NATURAL RESOURCES CHARLESTON 25305

ARCH A. MOORE, JR.
Governor

July 9, 1985

RONALD R. POTESTA Director

MICHAEL A. FOTOS
Deputy Director

Mr. Danny Gray Appalachian Power Company John Amos Plant Rt. 35 St. Albans, WV 25177 RECEIVED

JUL 19 1985

Re: CEI - WVD980554646 - 6/12/85

Dear Mr. Gray:

Enclosed is a copy of the "Compliance Evaluation Inspection" (CEI) Report completed on your facility by representatives of West Virginia's Division of Water Resources. This report is based on the inspection conducted on June 12, 1985.

There were no areas of non-compliance of the appropriate Hazardous Waste Regulations documented during this inspection.

Thank you for your assistance and cooperation during this inspection. If you should have any questions concerning the inspection or attached report, please feel free to call.

Very truly yours,

DIVISION OF WATER RESOUR

Robert L. Jelacic, Section Leader Compliance Assurance Section Solid and Hazardous Waste/ Ground Water Branch.

RLJ/nl Enclosure

cc: Doug Donor, USEPA, Region III Rebecca J. Robertson, WVDWR

COMPANY NAME: Appalachian Power Co., John Amos Plant

ID # WVD980554646

ADDRESS: Rt. 35

TYPE OF FACILITY: Small Q

Generat

St. Albans, WV 25177

COMPANY CONTACT: Tom Worstell, Chief Chemist

Danny Gray, Environmental Engineer (Senior)

PHONE: (304) 755-5301

PURPOSE: To conduct a Compliance Evaluation Inspection at an interim status facility.

Hazardous Waste Management Act, Chapter 20, Article 5E; APPLICABLE REGULATIONS:

West Virginia Administrative Regulations for Chapter 20-5E;

and 40 CFR - Part 265.

None. LIST OF CHEMICALS:

DATE INSPECTED: 6/12/85

Rebecca J. Robertson, Water Resources Inspector, DWR/DNR (1) INSPECTORS:

Gary Blackhurst, Water Resources Inspector, DWR/DNR

Rebecca J. Robertson on 6/14/85. Prepared by:

### Table of Contents

### Location Map

### Inspection Report

### Attachments -

"A" - Checklist for Small Quantity Generators

'B" - APCO letter of February 23, 1984

"C" - APCO letter of April 29, 1985

'D" - Leachate Analysis, March 11, 1982

'E" - Waste Sample I.D. sheet

''G'' - APCO Letter, June 3, 1983

"H" - Site Map

Prepared by: Rebecca J. Robertson

Subject: Compliance Evaluation Inspection (CEI) of John Amos Plant, Appalachian

Power Company, St. Albans, Putnam County, WV - WVD980554646.

Date Inspected: 6/12/85

On the above date, this inspector with Gary Blackhurst, Inspector conducted a CEI at the above facility at 1000 hrs. Mr. Tom Worstell, Chief Chemist and Danny Gray, Environmental Engineer Senior, from Roanoke, Virginia were the representatives of the company during the inspection. Inspector Robertson advised Mr. Worstell and Mr. Gray that the inspection was under authority of Section 3007(a) of the Resource Conservation and Recovery Act (RCRA) and Chapter 20, Article 5E, and that during the inspection any confidential information or trade secrets would be treated as such and were covered by Section 3007(b) of RCRA, and 40 CFR, Part 2. Both consented to continue the inspection.

Initially, the permit status of the facility was discussed. Recently, (February 23, 1984) the Appalachian Power Company submitted a letter to the EPA withdrawing their Part A application, stating that any waste generated at the facility would be accumulated less than 90 days and shipped for off-site disposal. On April 29, 1985, a letter was submitted by APCO stating they had treated no hazardous waste during their interim status period. The facility's boiler cleaning waste stream was not considered hazardous and, therefore, the facility contends they have treated no hazardous waste and are requesting they be treated as a small quantity generator rather than a TSD and Generator facility. At this time (letter of June 3), they are requesting to maintain their ID number for precautionary measures.

The facility provides electric services, and wastes generated (waste oil and Varsol, a solvent) are mixed in a large tank and are distributed on a coal pile for added heat value, thus beneficially using this mixture (referenced letters are enclosed in the report).

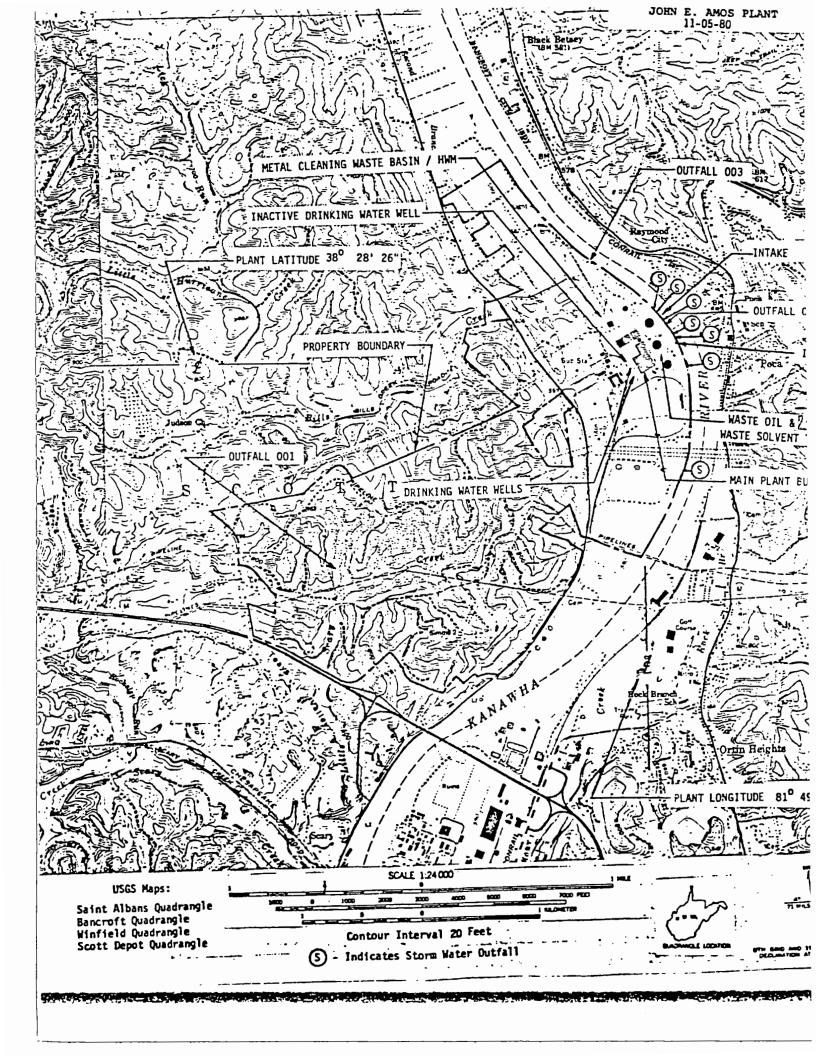
During our inspection the facility stated they had no hazardous waste on site at this time. Waste oil and solvent tanks (3) were inspected during the physical inspection. Since they are not considered as hazardous waste, the tanks are not labeled as such.

The metal cleaning pond, which the facility originally notified for, has been removed as a treatment area for hazardous waste since they have never treated waste at that part of the facility. The waste stream from the cleaning of the boiler tubes, generated once per year, is usually a pH of 3-10, and the metals are within standards for E.P. Toxicity. Therefore, they are not considered as hazardous (see results following April 29, 1985 letter). The waste enters the pond and is treated with lime and then discharged after a period of agitation and settling, through an NPDES permitted outfall.

The Small Quantity Generator checklist was completed and a tour of the facility was then made. Several drums were noticed on the facility, most containing waste oil and marked as such, and others containing products. All waste generated are shipped to Rollins at Deerpark, Texas. No containers were found containing hazardous waste.

At this time, the inspectors completed the physical tour and returned to the office to close the inspection. The findings were discussed and the inspection completed at 1130 hours.

A Small Quantity Generator's Checklist was completed due to the facility's withdrawal of Part A, and since the company claims no hazardous waste has been treated, stored, or disposed of at the site. It is questioned as to whether this should be done since there is no notification that the withdrawal has been acknowledged or accepted.



whole checkitse for small dimicity dendinedra of univariods where	K.U. U.S.
me of Facility: APCO - John Amos Plant	Inspection file
dress: (R+ 35)	
St Albans, W.V. 25177	Reviewer:
PA Cenerator ID Number: WVD 980 554646 :	
Danny Gray, Environmental Engineer, Sr. Itle: Tom Worstell, Chief Chemist	Date Reviewed:
elephone Number: (304)755 - 5301	
æ	Form "C"
ne questions contained in this checklist apply to owners and operators who re small quantity generators (less than 1000; kg per month).	
	1:
<ol> <li>Has the facility identified all hazardous wastes generated on site in accordance with 8262.11?</li> <li>What types of waste are generated at the facility and the quantity of each per month? None at this time.</li> </ol>	
3. Does the facility treat or dispose of his hazardous waste in an on-site facility; or	Yes
ensure delivery to an off-site treatment, storage or disposal facility? It was to is generated	Yes Yes
4. Does <u>either</u> the on-site (treatment, disposal) or off-site (treatment, storage or disposal) facility?	•
A. Have a Federal hazardous waste permit?	Yes
B. Have interim status?	Yes
C. Beneficially use or reuse, or legitimately recycle or reclaim hazardous waste?	<i>0</i> Yes
D. Treat waste prior to beneficial use or reuse, or legitimate recycling or reclamations?	Yes (
E. Have a State permit to manage industrial or municipal hazardous waste?	Yes
5. Please list name, address and EPA I.D. number for each fact where each waste is disposed.  Po. Box 609 2027 Bake Pollins, Deerpark, Texas 775	-

6. Has the small quantity generator accumulated an amount of hazardous waste on-site, which is greater then?	٠
A. 1000 Kilograms?	. = Y-2.
B. 1 Kilogram of acutely hazardous waste?	Yes
C. 100 Kilograms of any residue, contaminated soil, water or debris from a spill of hazardous waste?	Yes
7. If so,	
A. Is the date upon which the accumulated amount in question 6 was reached clearly marked on the container?	Yes
B. Has the hazardous waste been stored at the facility for greater than 90 days from the accumulation date in (A) above?	. Yes
C. Are the containers packaged, labeled and marked in accordance with DOT regulations?	Yes /
D. Is the hazardous waste stored in an on-site facility, which has interim status or a State/Federal hazardous waste permit?	Yes V/
Inspector's Name: Telecra folicition  Title: Nater Resources Inspector  Agency: De of Mater Resources Dept of Natura  Office Location: 4867 Brienda Lane, Charleston,  Date of Inspection: Jay Blackhurst  Title: Name: Say Blackhurst  Title: Nater Resources Inspector  Agency: DWR-DNP Sythway Office Location: 4867  Charle  Date of Inspection: 4867	La Regoures ter Branch 31.V. 253
	,

February 23, 1984

CERTIFIED LETTER

Ms. Joan Henry (3HW32)
U. S. Environmental Protection Agency
Region III
Sixth and Walnut Streets
Philadelphia, Pa. 19106

Re: Permit Withdrawal Report
Appalachian Power Company
John E. Amos Plant
EPA I.D. No. WVD980554646

Dear Ms. Henry:

On November 17, 1980, Appalachian Power Company (APCo) submitted to U. S. EPA, Region III, a hazardous waste permit application for the above facility in accordance with the Resource Conservation and Recovery Act (RCRA). The application was submitted as a precautionary measure to obtain interim status; however, to date no hazardous wastes have been treated, stored, or disposed.

Since APCo does not anticipate on-site treatment, storage, or disposal in the future, we are hereby withdrawing the Part A application and will not file a Part B application. Any hazardous waste that may be generated will be accumulated on-site for ninety days or less for off-site disposal.

If you have any questions concerning this letter or the facility, please call me at (703) 985-2429.

Sincerely,

Edward L. Kropp

Environmental Affairs Director

ELK:DLG:dd

cc: Ms. Bonnie Guy

U. S. EPA, Region III

Philadelphia, Pa. 19106

ost Office Box 2021, Roanoke, Virginia 24022 Telephone: area code (703) 985-2300

April 29, 1985

CERTIFIED LETTER

Mr. Stephen R. Wassersug, Director Hazardous Waste Management Division U.S. Environmental Protection Agency Region III 841 Chestnut Building Philadelphia, Pennsylvania 19107

Re: WVD 980554646

John E. Amos Plant

Dear Mr. Wassersug:

In response to your letter concerning the Appalachian Power Company facility listed above, we are submitting the following response.

Appalachian Power Company submitted a Part A hazardous waste permit application for the above-listed facility on December 17, 1980 as a precautionary measure to preserve the privileges offered as an interim status facility. On May 19, 1982, Appalachian Power Company filed an amendment to the application which removed the storage and disposal listing for the surface impoundment.

On February 23, 1984, Appalachian Power Company filed a letter requesting that the Part A application for this facility be withdrawn since no hazardous wastes were treated at this facility during the interim status period. Since no hazardous wastes were treated, stored, or disposed of at this facility, a Part B application is not required and closure of the facility units is not required.

Pursuant to my conversation with Mr. Harry Harbold, I am attaching copies of analyses of a boiler cleaning waste stream.

If you should have additional questions, please contact me at (703) 985-2376.

Sincerely,

Danny L. Gray, P.E.

Environmental Engineer Senior

DLG:d Attachments U.S. Environmental Protection Agency Region III 841 Chestnut Building Philadelphia, Pennsylvania 19107

bc: C. E. Shay - Amos Plant
R. W. Reeves/T. E. Webb/A. R. Wood - Columbus

GENERAL LABORATORY

TW WORS TELL

Pail Address P.O. Box 565 Huntington, WY 25710 Parcel Post and Express Address 1122 Seventh Avenue Huntington, NY 25701

Company & Facility APCO. JOHN AMOS PLANT	Company & Facility	APCO.	JOHN	AMOS	PLANT
--	--------------------	-------	------	------	-------

NPDES Permit No. (If applicable)

Outfall No. (If applicable)

Sample Collection: (Date) 12-31-81 (Time) 1400 (Source)

METAL Treating Pond Pump LINE

	Metal Trea	ATING POND PUMP LINE
Sample	Received: (Date) 3-11-82	
STORET #	PARAMETER mg/L	
01022	Boron, B	STORET / PARAMETER µg/L
71870	Bromide, Br	
00940	Chloride, Cl	01105 Aluminum, Al
00340	COD	01097 Antimony, Sb 01002 Arsenic, As 220
00720	Cyanide, CN	
00951	Fluoride, F	01007 Barium, Ba <u>378.</u> 01012 Beryllium, Be
00610	Nitrogen, Ammonia, NH3	01027 Cadmium, Cd 2.0.
00630	Nitrogen, Nitrate-Nitrite	01032 Chromlum, +6Cr CCO
00620	Nitrogen, Nitrate, NO3	01034 Chromium, Cr 32.
00615	Nitrogen, Nitrite, NO2	01037 Cobalt, Co
00605	Nitrogen, Total Organic	01042 Copper, Cu
00665	Phosphorus, P	01045 Iron, Fe
00955	Silica, SiO2	01051 Lead, Pb 20.
00945	Sulfate, SO4	01055 Manganese, Mn
00745	Sulfide, S	71900 Mercury, Hg .3
38260	Surfactants, HBAS	01062 Holybdenum, Ho
00625	TKN, N	01067 Nickel, Ni
00680	TOC, C	01147 Selenium, Se - 220
	μg/L	01077 Silver, Ag 2/00
39516	PCBs	01059 Thallium, Tl
32730	Phenolics .	01102 Tin, Sn
	Hisc. units	01152 Titanium, Ti
00403	pH, Lab @ 25°C	01087 Vanadium, V
		01092 Zinc, Zn
	mg/L	mg/L
70508	Acidity, CaCO3	00916 Calcium, Ca
00410	Alkalinity, CaCO3	74010 Iron, Fe
50064	Chlorine, FAC	00927 Magnesium, Mg
5006 <b>0</b>	Chlorine, TRC	00937 Potassium, K
00900	Hardness, Total CaCO3	00929 Sodium, Na
0055 <b>6</b>	Oll & Grease	
7030 <b>0</b>	Residue, Filterable	00310 B0D5, mg/L
00530	Residue, Nonfilterable	31616 Fecal Coliform, #/100ml
0050 <b>0</b>	Residue, Total	34466 Phenol, µg/L
00505	Residue, Volatile	
<b>0</b> 0 <b>740</b>	Sulfite, 503	
	Misc. units	<u> </u>
08000	Color, Pt-Co Units	
00083	Color, Visual Severity	
00056	Flow, GPD	
00058	Flow, GPH	
500 <b>50</b> <b>01330</b>	Flow, MGD Odor, Severity	Analysis by: PCH, AMW, JSS, JLB, WC
00400	pH, Field	West and the Land of the Color
00403	pH, Lab @ 25°C	
00095	Sp. Cond. µmhos @ 25°C	10001/0.
00010	Temp. OC	Report Issued By:
00011	Temp. of	10,000 0,000
00076	Turbidity, NTU	1 7 07
01 <b>350</b>	Turbidity, Severity	Date Issued: 4-1-82

NOTES:

7 5	RETTIEWEII		AMERICAN ELECTRIC POWER SENERAL LABORATORY	
7 F	= Novthup	<u> </u>		ENVIKONMENTAL ENGINEERING DIV
三	Worstell		Meil Address P.D. Box 565 Huntington, MY 25710	Parcel Post and Express Address 1122 Seventh Avenue Muntiagton, NY 25701
Company	& Facility AP	Co,	John,	Amos Plant
NPDES P	ermit No. (If applicable)			
Outfall	No. (if applicable)			
Sample	Collection: (Date) 4-2	-83 n	ine) 1535-163.	5 (Source) Un+ 2
	Che	wica	1 Clez	MINA Composite
Sample	Received: (Date) 4-6	-83	(Analysis No.)_	D83039
STORET #	PARAMETER	ing/L	T	
01022	Boron, B		STORET # PARAM	ETER 19/L
71870	Bromide, Br		01105 Alumi	num, Al
00940	Chloride, Cl			ony, Sb
00340	COD			ic, As 60-
00720	Cyanide, CN			m, Ba <650 *
00951	Fluoride, F			lium, Be
00610	Nitrogen, Ammonia, NH3			um, Cd <20
00630	Nitrogen, Nitrate-Nitrite			ium, +6Cr 25.
00620	Nitrogen, Nitrate, NO3		· · · · ·	ium, Cr 4,383.
00615	Nitrogen, Nitrite, NO <sub>2</sub>		01037 Cobal	
00605	Nitrogen, Total Organic		1 77	r, Cu
00665	Phosphorus, P		01045 1 ron.	
00955	Silica, SiOz		01051 Lead.	
00945	Sulfate, SO4			nese, Mn
00745	Sulfide, S			ry, Hg <u>2.</u>
38260	Surfactants, MBAS			denum, Mo
00625	TKN, N		01067 Nicke	1, NI
00680	TOC, C			ium, Se <20
		μg/L	01077 Silve	
39516	PCBs		01059 Thall	lum, Tl
32730	Phenolics		01102 Tin,	Sn
		Misc. units		ium, Tl
00403	p <b>H, Lab @ 25°C</b>			ium̃, V
			01092 Zinc,	Zn
		mg/L		<u>mg/L</u>
70508	Acidity, CaCO3			um, Ca
00410	Alkalinity, CaCO3		74010 Iron,	
50064	Chlorine, FAC			slum, Mg
50060	Chlorine, TRC			slum, K
00900	Hardness, Total CaCO3		0092 <b>9</b> Sodju	m, Na
00556	Oil & Grease		00310	- /1
70300	Residue, Filterable		00310 BOD5,	mg/L
00530	Residue, Nonfilterable	<del></del>		Coliform, #/100ml
00500	Residue, Total		34466 Pheno	1, μg/L
00505	Residue, Volatile	<del></del>		
00740	Sulfite, SO3	Misc. units		
00080	Color DesCo Units	MISC. UIII	·	1 2 2 2
00080	Color, Pt-Co Units Color, Visual Severity			
00083			<u> </u>	APP.
00056	Flow, GPD			<b>D</b> 1975
00058	Flow, GPM Flow, MGD	<del></del>		S TULLIAND N
50050	Odor, Severity	<del></del>	Analysis by: S	SS AMO JUNEARING RES
01330 00400	pH, Field		2.70	
00403	pH, Lab @ 25°C			A STAIR
00405	Sp. Cond. umhos @ 25°C			1300
00010	Temp. °C		Report Issued	By: Wath ocole
. 00011	Temp. OF		1	- Cultitude
00076	Turbidity, NTU			1 11 02
01350	Turbidity, Severity		Date Issued:	4-11-83
				7 00-1-01-05
NOTES:	Analysis by E	PTOX	ICITY Tes	+ PROCEDURE
Feder	Analysis by E	Vol 45	, No 98 P	33127

Instrument Sensituity

	SAFFLE NO. COZIGO (to be fiffed in by waste testing laboratory)
ŧ	SAMPLING LOCATION John Amos Plant St Albans WVa name of facility and Company city and state
	Has it rained or snowed at this location in the 3 days before this waste sample was collected? . □ yes □ no
	SAMPLE TYPE Metal Treatment Pond Wastewate (examples: pyrites, cooling tower sludge, metal cleaning waste solvent, etc.)
. • .	□ composite
•	SAMPLE SOURCE Discharge and of pump piping pyrite  (Please be specific as possible. Examples: north end of ash pond #2 cooling tower basin coal pile sump, end of sluice pipe, waste solvent drum in east service area., etc.)
	SAMPLING DATA $12-31-84$ and TIME $1400$
	SAMPLE CONDITION \( \overline{\text{W}} \) Wet \( \overline{\text{Dry}} \)
	☐ Watery ☐ Oily ☐ Sludge or Slurry ☐ Solid
	contains solvent $N_0 \wedge e$ (name solvent)
	pH at time of sampling /0.5 (if applicable)
	The state of the s
	Describe how material in the container is representative of the entire waste which was sampled:  Metal treatment pand was a giteted with air to mix pand before the day of pumping
	SAMPLE COLLECTED BY Diana Smith Thomas W Worstell print name of person and Company signature of this person or supervisor
	THIS SHEET MUST BE COMPLETED AND BE ATTACHED TO EACH SAMPLE SENT TO THE WASTE TESTING LABORATORY. A SEPARATE, ATTACHED MEMO WHICH LISTS TESTING REQUIREMENTS (type of analyses, priority, etc.) IS NECESSARY FOR THIS SAMPLE TO BE PROPERLY PROCESSED.
	THIS SHEET, OR A COPY, MUST BE ATTACHED TO EVERY FILE COPY OF THE WASTE LABORAT DATA REPORT FOR THIS SAMPLE. THE LAB MUST SEND FULLY COMPLETED (see box below) COPIES TO THE PERSON WHO SIGNED THIS FORM ABOVE AND TO THE ENVIRONMENTAL DIVISI THESE FILES MUST BE RETAINED AT LEAST THREE YEARS.
	FINAL DETERMINATION (to be filled in by laboratory supervisor). This waste sample is hazardous non-hazardous because it exhibits characteristic(s) of ignitability, corrosivity, reactivity, toxicity or none of these characteristics as per 40 CFR Part 261. (To be filled in by waste testing laboratory; i.e., Laboratory Supervisor's Initials Huntington Laboratory)

June 3, 1985

### CERTIFIED LETTER

Mr. David W. Robinson, Chief State of West Virginia Department of Natural Resources Division of Water Resources 1201 Greenbrier Street Charleston, West Virginia 25311

Re: Request for submission of Part B of the permit application

EPA I.D. No: WVD 980554646

Facility Name: Appalachian Power Company, John Amos Plant

Dear Mr. Robinson:

This letter is in response to your letter of May 8, 1985, (copy attached) in which you formally request the submission of a Part B permit application for the Appalachian Power Company - John Amos Plant (APCo).

Appalachian Power Company <u>will</u> <u>not</u> be submitting a Part B application for a hazardous waste management permit. Appalachian Power Company has previously notified the U.S. Environmental Protection Agency (EPA) of this decision, however, the following background information is provided for clarification.

On November 17, 1980, APCo filed a Part A hazardous waste permit application for the John Amos Plant with the EPA. The Part A application was filed as a precautionary measure in order to preserve interim status under the hazardous waste program.

On May 19, 1982, APCo amended it's application to remove the storage and disposal listing for the surface impoundment.

On February 23, 1984, APCo filed a letter with EPA requesting that the Part A application for the John E. Amos Plant be withdrawn since no hazardous wastes had been treated at the facility during the interim status period (copy attached). Since no hazardous wastes were treated, stored, or disposed of at this facility, a Part B application is not required and closure of the facility units is not required.

At the present time, the John E. Amos Plant should be listed as a small quantity generator since no hazardous waste activities are occurring. However, the EPA Hazardous Waste Identification Number will be maintained as a precautionary measure.

If you have any questions concerning this letter, please contact this office at (703) 985-2376.

Sincerely,

Danny L. Gray, P.E.

Environmental Engineer Senior

DLG:d

Attachments

cc: Mr. Rik Melvin
West Virginia Department
of Natural Resources
Charleston, WV 25311

bc: G. M. Gillock - Roanoke R. W. Reeves - Columbus C. E. Shay - Amos Plant

